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10 Attorneys for Plaintiffs ROSE FEAVER,  
11 ARTIN ADAMIAN, AND MYUNG SUN SHIM  
and the Class

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

1 TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

2 Plaintiffs Rose Feaver, Myungshun Shim, and Artin Adamian (together "Plaintiffs") and  
3 Defendants Kaiser Foundation Health Plan, Inc., and Kaiser Foundation Hospitals (together  
4 "Defendants", and together with Plaintiffs the "Parties"), by and through their respective counsel  
5 of record hereby stipulate as follows:

6 WHEREAS, pursuant to the discourse on the record at the Case Management Conference  
7 that occurred in this Action on June 4, 2015, the Court Ordered (Docket No. 25) the following  
8 briefing and hearing schedule on Plaintiffs' Motion for Conditional Certification:

9 Plaintiffs' Motion: 9/10/2015

10 Defendants' Opposition: 10/15/2015

11 Plaintiffs' Reply: 10/29/2015

12 Hearing: 11/12/2015 at 1:30 p.m.

13 Further CMC: 11/12/2015 at 1:30 p.m.

14 Close of Discovery: 8/31/2015

15 WHEREAS, the Parties have served written discovery and Defendants have served  
16 notices of the depositions of the three named Plaintiffs in this Action pursuant to the Court's  
17 Minute Order dated June 4, 2015;

18 WHEREAS, Plaintiff Feaver, during the week of August 2, 2015, experienced a family  
19 emergency, whereby Plaintiff Feaver's son was in a catastrophic traffic accident likely resulting  
20 in a traumatic brain injury, among other injuries suffered;

21 WHEREAS, Plaintiff Feaver has left the State of California to be with her son in the  
22 State of Arizona, and does not intend to return to the State of California until the week of  
23 September 7, 2015;

24 WHEREAS, Plaintiffs have requested that Defendants continue their deposition of  
25 Plaintiff Feaver until such time as she has returned from caring for her injured son;

26 WHEREAS, Defendants did not object to Plaintiffs' request to accommodate Plaintiff  
27 Feaver's situation and continued the dates of all depositions;

28 WHEREAS, Plaintiffs have been meeting and conferring with Defendants regarding

1 Defendants responses to Plaintiffs' discovery requests and the Parties have been working in good  
2 faith to exchange adequate discovery in advance of the motion for conditional certification;

3 WHEREAS, the Parties have agreed that Defendants will produce documents Plaintiffs  
4 believe are necessary for Plaintiffs' motion for conditional certification during the week of  
5 August 24, 2015;

6 WHEREAS, the Parties request an Order from the Court continuing the briefing  
7 deadlines for the motion for conditional certification, so that Defendants may complete their  
8 discovery while accommodating Plaintiff Feaver's requested continuance of her deposition and  
9 Plaintiffs will have adequate time to review the documents produced before filing their motion.  
10 Plaintiff Feaver has in effect requested an additional 5 weeks from Defendants before submitting  
11 to her deposition, therefore, the Parties request that all dates be moved by 5 weeks. The resulting  
12 schedule would look as follows:

13 Plaintiffs' Motion: 10/15/2015

14 Defendants' Opposition: 11/24/2015

15 Plaintiffs' Reply: 12/8/2015

16 Hearing: 12/17/2015 at 1:30 p.m.

17 Close of Conditional Certification Discovery: 10/5/2015

18 In addition, given that the Court's ruling on the Motion for Conditional Certification will  
19 greatly impact the remaining claims in this case, the Parties request that the CMC that was  
20 scheduled to take place at the same date and time as the hearing on Plaintiffs' Motion for  
21 Conditional Certification be continued until 14 days after the Court issues an Order on Plaintiffs'  
22 Motion. The Parties request that they submit a joint report suggesting a further schedule for this  
23 case within 5 days of the Court's ruling on the Motion for Conditional Certification.

24 Dated: August 25, 2015

KEARNEY LITTLEFIELD, LLP  
STONEBARGER LAW, APC

26 By: Prescott W. Littlefield

27 Prescott W. Littlefield

28 Attorneys for Plaintiff

1 Dated: August 25, 2015

SEYFARTH SHAW, LLP

2  
3 By: Jessica Lieberman  
4 Jessica Lieberman  
Attorneys for Defendant

5  
6 I, Prescott W. Littlefield, hereby attest that pursuant to LR 5-1(i) I have on file  
7 concurrence for any signatures indicated by a "conformed" signature (/s/) within this e-filed  
8 document.

9  
10 /s/ Prescott W. Littlefield  
Prescott W. Littlefield

11  
12  
13 **[PROPOSED] ORDER**

14 Pursuant to the Parties' Stipulation, the briefing schedule for Plaintiffs' Motion for  
15 Conditional Certification is as follows:

16 Plaintiffs' Motion: 10/15/2015  
17 Defendants' Opposition: 11/24/2015  
18 Plaintiffs' Reply: 12/8/2015  
19 Hearing: 12/17/2015 at 1:30 p.m.  
20 Close of Conditional Certification Discovery: 10/5/2015

21  
22 In the Court's Order regarding conditional certification, the Court will set a date for a  
23 further case management conference and a filing deadline for a joint case management statement.

24 IT IS SO ORDERED. Further CMC is reset for 2/4/16 at 10:30 a.m. An updated  
25 joint CMC statement shall be filed by 1/28/16.

26 Dated: \_\_\_\_\_ 8/27/15  
27

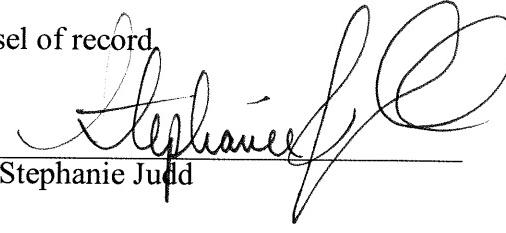
28  
Hon. Edward M. Chen  
United States Court Judge  
Northern District of California  
  
IT IS SO ORDERED  
Judge Edward M. Chen

1  
2                   CERTIFICATE OF SERVICE  
3

4                   The undersigned hereby certifies that on August 25, 2015, the foregoing  
5

6                   **• STIPULATION TO CONTINUE BRIEFING AND HEARING ON CONDITIONAL  
7                   CERTIFICATION AND [PROPOSED] ORDER**

8                   was filed electronically with the Clerk of the Court to be served by operation of the Court's  
9                   CM/ECF electronic filing system to all counsel of record.

10                     
11                   Stephanie Judd  
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